

Schary, Claire

From: Bobby Cochran <cochran@willamettepartnership.org>
Sent: Thursday, November 21, 2013 10:25 AM
To: Schary, Claire
Subject: Re: Early draft of my summary of baseline issues

Want to talk 1:30-3:00 this Fri? I've got as much time as we need up to 4pm. I hope we didn't surprise folks with the consolidated document, but we kept working through the shutdown to get to one document we could use to spark discussions.

We can talk more on Fri, but I'm having a hard time understanding how LAs are treated differently than WLAs. I get what you can require and can't require. I just don't get how you define what reduction target the NP sector is shooting for. Is it to go from current loads to LAs? Or from LA to close to zero? Or from current load, past LA, to close to zero?

Thanks Claire.

PS--Presented at ID Water Users Assoc this morning ,which went well. Sounds like Dave Tuthill and some folks are swinging by your way Dec 16 to talk trading.

On Thu, Nov 21, 2013 at 9:56 AM, Schary, Claire <Schary.Claire@epa.gov> wrote:

Bobby,

I'm not sure what you are asking – but if you are asking if EPA has ever considered changing the way it talks about Load Allocations, as a fixed amount the NPS category is allowed to discharge, versus our more typical view of it as an amount or percentage of current loads that need to be reduced – then the answer is not really. This has not come up in internal discussions on trading because it is not feasible. I asked Bill Stewart and he said it's nearly impossible to measure or estimate with enough precision to have that first approach be useful or meaningful. It's much easier and more accurate to measure or closely estimate reductions from current loads. And it doesn't get us in trouble with it looking like something that would go in a permit, when we don't have authority to require a NPS not discharge above a certain amount (except for CAFOs and a few other categories where we have been granted authority).

You will see my concern with that part of the draft Discussion Guide for Baselines as soon as I'm done inserting my comments in Track Changes (and I'm consolidating comments from a few others as well). I hope to send that to you and Carrie by Friday morning. Can we talk on Fri. about this document? I'm free all day except noon-ish.

-- Claire

Claire Schary

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From: Bobby Cochran [mailto:cochran@willamettepartnership.org]
Sent: Wednesday, November 20, 2013 5:23 PM
To: Schary, Claire
Subject: Re: Early draft of my summary of baseline issues

Thanks Claire. Have you played with getting clear about whether Load Allocation is the allowable pollution vs an amount the sector needs to reduce?

Bobby Cochran

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On Nov 20, 2013, at 10:56 AM, "Schary, Claire" <Schary.Claire@epa.gov> wrote:

<image001.gif>

Bobby & Carrie,

I'm trying to come up with a different way of framing the baseline issues identified in the draft discussion guide you sent out for the Dec. meeting. I have to run off to a meeting right now myself, but wanted to send this to you as an early draft so that you can see where I am heading with this. I'll keep working on it and also see what answers EPA may have to bring to the table. Feel free to call me to discuss and to tell me what might be more helpful.

-- Claire

Claire Schary

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